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Attorneys for Defendant Apple Inc.

UNITED STATES DISTRICT COURT
LAS VEGAS, NEVADA

HEATHER FARRELL,

Plaintiff,

vs.

EXPERIAN INFORMATION SOLUTIONS,
INC.; and APPLE INC. dba APPLE CARD

Defendants.

Case No.: 2:21-cv-01761-JCM-DJA

**JOINT STIPULATION AND
ORDER FOR EXTENSION OF
TIME FOR DEFENDANT APPLE
INC. TO FILE A RESPONSIVE
PLEADING**

(FIRST REQUEST)

Pursuant to LR IA 6-1, LR IA 6-2 and LR 7-1, Defendant Apple Inc. (“Apple”) and Plaintiff Heather Farrell (“Plaintiff”) (collectively “The Parties”), through their counsel, respectively submit the following Joint Stipulation and Order For Extension of Time For Defendant Apple Inc. to File a Responsive Pleading (First Request). Plaintiff served Apple with the Summons and Complaint in this matter on October 4, 2021, with a responsive pleading deadline of October 25, 2021. The Parties stipulate that the deadline for Apple’s responsive pleading to Plaintiff’s Complaint be extended from October 25, 2021, up to and including December 17, 2021. This is to allow Apple additional time to thoroughly evaluate Plaintiff’s Complaint, as well as to file a responsive pleading. This request is made in good faith and not for any delay. This is the first request for an extension of time to answer or otherwise respond to Plaintiff’s Complaint.

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1 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Apple and
2 Plaintiff, through their respective counsel, that the time for Apple to file its responsive pleading to
3 Plaintiff's Complaint be extended from October 25, 2021 **up to and including December 17, 2021.**

4 Dated October 22, 2021.

5 **EVANS FEARS & SCHUTTERT LLP**

6 **FREEDOM LAW FIRM**

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8 By: /s/ Chad R. Fears
Chad R. Fears, Esq. (SBN 6970)
9 *Attorneys for Defendant Apple Inc.*

By: /s/ Gerardo Avalos
Gerardo Avalos, Esq. (SBN 15171)
George Haines, Esq. (SBN 9411)

10 Michael Kind, Esq. (SBN 13903)
KIND LAW FIRM

11 *Attorneys for Plaintiff Heather Farrell*

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14 **IT IS SO ORDERED.**

ORDER



15 DANIEL J. ALBREGTS
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: October 25, 2021

18 CASE NO.: 2:21-CV-01761-JCM-DJA
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of **JOINT STIPULATION AND ORDER FOR EXTENSION OF TIME FOR DEFENDANT APPLE INC. TO FILE A RESPONSIVE PLEADING (FIRST REQUEST)** was served on counsel of record this 22nd day of October, 2021 using the Court's CM/ECF System.

/s/ Faith Radford
An Employee of Evans Fears & Schuttart LLP